

4014 NW 13th STREET  
GAINESVILLE, FL 32609-1923  
352/377-5822 ■ FAX/377-7158

KA519-08-13  
February 10, 2009

Nancy E. Knight  
FDEP Southwest District  
13051 N Telecom Parkway  
Temple Terrace, FL 33637-0926

Dept. of Environmental  
Protection

FEB 12 2009

Southwest District

Subject: Submittal of Air Operation Permit Renewal  
C. W. Roberts Contracting Inc. – Wildwood Asphalt Plant  
Operation Permit No.: 7775176-002-AO  
Request for Additional Information

Dear Mrs. Knight,

On behalf of C.W. Roberts Contracting, Inc. (CWR), I am submitting the following information in response to your letter to Charles W. Roberts requesting additional information dated November 6, 2009. The format of responses is provided in the sequence of requested information. We appreciate your acceptance via email of an additional week to submit these responses.

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1. Facility Description

Are the 25,000 gallon mineral filler silo and the lime silo the same piece of equipment?

Answer: Yes

2. Emissions Unit Information

An air construction permit application must be submitted to the Southwest District to allow the operation of a portable RAP crusher at this facility. Please use the attached documentation as a guide to provide the required information for the new emission unit. The potential emissions must be calculated using the worst case (e.g., crusher with most emission points) crusher configuration. Include the applicability of 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines to the engine supplying power to the crusher.

Answer: Item 2 addresses two issues: 1) AC permitting of RAP (Recycled Asphalt Pavement) crushing and 2) applicability of 40 CFR 60, subpart IIII. These two issues are addressed separately below.

RAP Crushing: An application was submitted to FDEP, Southwest District with signature provided April 1, 2002, that included the RAP crusher. Presented in Attachment A is a copy of the emission unit section for the RAP crushing from that air construction permit application. Additional information pertaining to the RAP crusher unit was requested by FDEP on May 20, 2002 by letter from FDEP-Air Permitting Engineer, Mr. Quaid Noor. Responses were provided to FDEP by letter dated June 21, 2002. Copies of the RAI letter from Mr. Quaid Noor and the relevant responses to RAP crushing (RAI letter, question 3.) are also attached (Att. A).

The permit writer, Mr. Quaid Noor, reviewed and signed the AC permit (7775176-001-AC) which was issued on November 27, 2002. Please note that this AC permit is not available on the FDEP public internet database <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>. At your convenience, we request that this permit be available for public viewing on the database.

Permit 7775176-001-AC and the related correspondence clearly demonstrate that the information you are requesting has previously been submitted to, and has been reviewed by, the Department.

Applicability of 40 CFR 60, subpart IIII: CWR agrees that if engines used at the facility are subject to stationary Compression Ignition Internal Combustion Engines (CI ICE) NSPS, Subpart IIII (40 CFR 60.4200(a)), CWR must comply to this rule. As such, the permit should reflect requirements of this new rule. It is our understanding that an air construction permit is not required for this purpose.

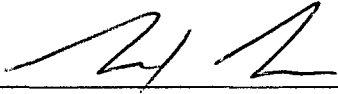
### 3. Required Documentation

Specific Condition No. 39, of Operation Permit 7775175-002-AO requires that copies of the records specified in Specific Conditions Nos. 25, 26, and 27 for the most recent month of operation be submitted with the operation permit renewal application. Please submit a copy of the records for September 2008.

Answer: Please find enclosed in Attachment B, the requested documentation.

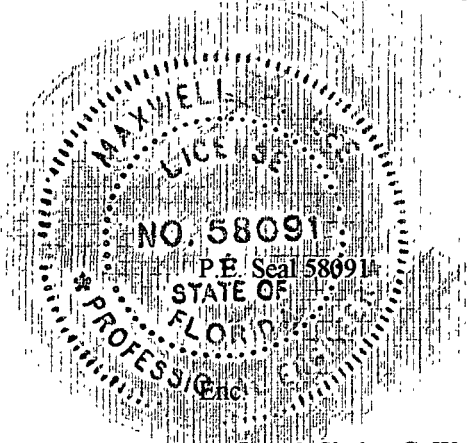
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If you have any questions concerning the application, please call me at (352) 377-5822 or cell (352) 318-4450.

Sincerely,



Max Lee, Ph.D., P.E.  
KOOGLER & ASSOCIATES

2/10/09  
Date



Dept. of Environmental  
Protection

FEB 12 2009

Southwest District

cc: Joseph Shuler, C. W. Roberts Contracting, Inc.



ATTACHMENT A

- 1) AIR CONSTRUCTION PERMIT APPLICATION (APRIL 1, 2002)
- 2) REQUEST FOR ADDITIONAL INFORMATION(RAI) (MAY 20, 2002)
- 3) RESPONSE TO RAI (JUNE 21, 2002)

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Emissions Unit Description and Status**

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>		
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;"><b>RAP crusher and screen conveyor subject to NSPS Subpart OOO and diesel engines for RAP crushing equipment</b></p>		
<p>3. Emissions Unit Identification Number:</p> <p>ID:</p>		<p><input checked="" type="checkbox"/> No ID</p> <p><input type="checkbox"/> ID Unknown</p>
<p>4. Emissions Unit Status Code: <b>C</b></p>	<p>6. Initial Startup Date:</p> <p><b>NA</b></p>	<p>6. Emissions Unit Major Group SIC Code: <b>29</b></p>
<p>8. Emissions Unit Comment: (Limit to 500 Characters)</p> <p><b>This emission unit consists of a Recycled Asphalt Pavement (RAP) crusher (Inertia Machine 2001, model 4048 washout unit with 275 HP diesel engine) and screen conveyor (Powerscreen, model Mark II with 37 HP diesel engine). The unit is intended to be used periodically for supplying RAP to the asphalt mix. Manufacturer specs / flow diagram are attached.</b></p> <p style="text-align: right; font-size: 1.2em;"><b>Dept. of Environmental Protection</b></p> <p style="text-align: right; font-size: 1.2em;"><b>FEB 12 2009</b></p>		

**Emissions Unit Control Equipment**

2. Control Equipment/Method Description (limit to 200 characters per device or method):	
N/A	Dept. of Environmental Protection  FEB 12 2009  Southwest District
2. Control Device or Method Code(s):	

**Emissions Unit Details**

1. Package Unit:		
Manufacturer:		Model Number:
2. Generator Nameplate Rating:		MW
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	N/A	
2. Maximum Incineration Rate:	N/A	lb/hr      tons/day
3. Maximum Process or Throughput Rate:	<b>200 tph and 200,000 tpy</b>	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
24 hours/day		7 days/week
52 weeks/year		8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>The maximum processing amount is based on:</b>  <b>Hourly- the max. potential production suggested by the RAP unit manufacturer/supplier,</b>  <b>Yearly- 40 percent of the maximum facility asphalt production of 500,000 ton per year.</b></p>		

**B. EMISSION POINT (STACK/VENT) INFORMATION**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? <b>Portable</b>		2. Emission Point Type Code: <b>3</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <b>This unit includes crusher, screening and conveying equipment. The attached manufacturer drawings indicate the Inertia unit includes hopper, screen, crusher, conveyor and engine. The Mark II includes hopper, conveyor and engine.</b>			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: <b>NA</b>			
5. Discharge Type Code: <b>F</b>	6. Stack Height: <b>N/A</b> feet	7. Exit Diameter: <b>N/A</b> feet	
8. Exit Temperature: <b>ambient</b> °F	9. Actual Volumetric Flow Rate: <b>N/A</b> acfm	10. Water Vapor: <b>N/A</b> %	
11. Maximum Dry Standard Flow Rate: <b>N/A</b> dscfm		12. Nonstack Emission Point Height: <b>NA</b> feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

**C. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment  1  of  2

3. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Mineral Products: Stone Quarry/Processing: Primary Crushing</b>		
4. Source Classification Code (SCC): <b>3-05-020-01</b>		3. SCC Units: <b>Tons Processed</b>
4. Maximum Hourly Rate: <b>200</b>	5. Maximum Annual Rate: <b>200,000</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>NA</b>	8. Maximum % Ash: <b>NA</b>	9. Million Btu per SCC Unit: <b>NA</b>
10. Segment Comment (limit to 200 characters): <b>Hourly rate is based on manufacturer/supplier specifications. Annual rate is 40 percent of current facility-wide 500,000-ton annual asphalt production limit.</b>		

**Segment Description and Rate:** Segment  2  of  2

2. Segment Description (Process/Fuel Type ) (limit to 500 characters):  <b>Internal Combustion Engines: Industrial Diesel: Reciprocating</b>		
2. Source Classification Code (SCC): <b>2-02-001-02</b>		3. SCC Units: <b>Thousand gallons burned (TGB)</b>
4. Maximum Hourly Rate: <b>0.00579</b>	5. Maximum Annual Rate: <b>50.77</b>	6. Estimated Annual Activity Factor: <b>NA</b>
7. Maximum % Sulfur: <b>0.5</b>	8. Maximum % Ash: <b>NA</b>	9. Million Btu per SCC Unit: <b>141 mmBtu/TGB</b>
10. Segment Comment (limit to 200 characters): <b>Maximum energy use rates: (275 +37 HP) x 2545 Btu per hr/HP = 794,040 Btu/hr = 0.794 MMBtu/hr 137,000 Btu/gal (AP-42 App. A) 794,040 Btu/hr x gal/137,000 Btu = 5.79 gal/hr 5.79 gal/hr x 8760 hr = 50.77 TGB</b>		



**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**

**Potential Emissions**

1. Pollutant Emitted: <b>PM</b>		2. Pollutant Regulatory Code: <b>EL</b>	
3. Primary Control Device Code: <b>NA</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>0.49 lb/hour                      1.22 tons/year</b>		7. Synthetically Limited? <b>[ X ]</b>	
8. Emission Factor: <b>see below</b>  Reference: <b>see below</b>		9. Emissions Method Code: <b>3</b>	
10. Calculation of Emissions (limit to 600 characters): <b>Crusher Fugitives: Emiss. Factor: 0.00059 (PM10) x 2.1 = 0.0012 lb/ton, AP-42, Table 11.19.2-2</b> <b>Hourly: 0.0012 lb/ton x 200 ton/hr = 0.24 lb/hr</b> <b>Annual: 0.0012 lb/ton x 200,000 ton/yr x ton/2000 lb = 0.12 ton/yr</b>  <b>Engine Fugitives: Emiss. Factor: 0.31 lb/MMBtu, AP-42, Table 3.3-1</b> <b>Hourly: 0.794 MMBtu/hr x 0.31 lb/MMBtu = 0.25 lb/hr</b> <b>Annual: 0.25 lb/hr x 8760 hr/yr x ton/2000 lb = 1.095 ton/yr</b>  <b>Total –hourly: 0.24 + 0.25 = 0.49 lb/hr, -yearly: 0.12 + 1.095 = 1.215 ton/yr</b>			
11. Pollutant Potential Emissions Comment (limit to 200 characters):  <b>In accordance with AP-42, the PM10 emission factor for tertiary crushing is used for primary crushing and is multiplied by 2.1 to approximate PM. Annual RAP production is requested to be limited to 200,000 tons.</b>			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code: <b>NA</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions:  lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**

**Potential Emissions**

1. Pollutant Emitted: <b>PM10</b>		2. Pollutant Regulatory Code: <b>NS</b>	
3. Primary Control Device Code: <b>016</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>0.37 lb/hour                      1.15 tons/year</b>		7. Synthetically Limited? [ <b>X</b> ]	
8. Emission Factor: <b>see below</b>  Reference: <b>see below</b>		9. Emissions Method Code: <b>3</b>	
<p>10. Calculation of Emissions (limit to 600 characters):</p> <p><b>Crusher fugitives: Emiss. Factor: 0.00059 lb/ton, AP-42 Version Table 11.19.2-2</b>  <b>Hourly: 0.00059 lb/ton x 200 ton/hr = 0.118 lb/hr</b>  <b>Annual: 0.00059 lb/ton x 200,000 ton/yr x ton/2000 lb = 0.059 ton/yr</b></p> <p><b>Engine Fugitives: Emiss. Factor: 0.31 lb/MMBtu, AP-42 Table 3.3-1</b>  <b>Hourly: 0.794 MMBtu/hr x 0.31 lb/MMBtu = 0.25 lb/hr</b>  <b>Annual: 0.25 lb/hr x 8760 hr/yr x ton/2000 lb = 1.095 ton/yr</b></p> <p><b>Total –hourly: 0.118 + 0.25 = 0.368 lb/hr, -yearly: 0.059 + 1.095 = 1.154 ton/yr</b></p>			
<p>11. Pollutant Potential Emissions Comment (limit to 200 characters):</p> <p><b>In accordance with AP-42, the PM10 emission factor for tertiary crushing is used for primary crushing. Annual RAP production is requested to be limited to 200,000 tons.</b></p>			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code: <b>NA</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions:  lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**

**Potential Emissions**

1. Pollutant Emitted: <b>SO2</b>		2. Pollutant Regulatory Code: <b>EL</b>	
3. Primary Control Device Code: <b>NA</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>0.23 lb/hour</b> <b>1.01 tons/year</b>		7. Synthetically Limited? [ <b>X</b> ]	
8. Emission Factor: <b>0.29 lb/MMBtu</b> Reference: <b>AP-42, Table 3.3-1</b>		9. Emissions Method Code: <b>3</b>	
10. Calculation of Emissions (limit to 600 characters):  Hourly: <b>0.29 lb/MMBtu x 0.794 MMBtu/hr = 0.23 lb/hr</b> Annual: <b>0.23 lb/hr x 8760 hr/yr x ton/2000 lb = 1.01 ton/yr</b>			
12. Pollutant Potential Emissions Comment (limit to 200 characters): Annual facility-wide fuel oil usage limited to 1.2 million gallons in accordance with Rule 62-210.300(3)(c).			

**Allowable Emissions** Allowable Emissions  1  of  1

1. Basis for Allowable Emissions Code: <b>N/A</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION****Potential Emissions**

1. Pollutant Emitted: <b>NOx</b>		2. Pollutant Regulatory Code: <b>NS</b>	
3. Primary Control Device Code: <b>NA</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>3.05 lb/hour</b> <b>15.34 tons/year</b>		7. Synthetically Limited? [ <b>X</b> ]	
8. Emission Factor: <b>4.41 lb/MMBtu</b> Reference: <b>AP-42, Table 3.3-1</b>		9. Emissions Method Code: <b>3</b>	
10. Calculation of Emissions (limit to 600 characters):  Hourly: <b>4.41 lb/MMBtu x 0.794 MMBtu/hr = 3.05 lb/hr</b> Annual: <b>3.05 lb/hr x 8760 hr/yr x ton/2000 lb = 15.34 ton/yr</b>			
11. Pollutant Potential Emissions Comment (limit to 200 characters):			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code: <b>NA</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**

**Potential Emissions**

1. Pollutant Emitted: <b>CO</b>		2. Pollutant Regulatory Code: <b>NS</b>	
3. Primary Control Device Code: <b>NA</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>0.75 lb/hour                      3.30 tons/year</b>		7. Synthetically Limited? <b>[ X ]</b>	
8. Emission Factor: <b>0.95 lb/MMBtu</b> Reference: <b>AP-42, Table 3.3-1</b>		9. Emissions Method Code: <b>3</b>	
10. Calculation of Emissions (limit to 600 characters):  <b>Hourly: 0.95 lb/MMBtu x 0.794 MMBtu/hr = 0.75 lb/hr</b> <b>Annual: 0.75 lb/hr x 8760 hr/yr x ton/2000 lb = 3.30 ton/yr</b>			
12. Pollutant Potential Emissions Comment (limit to 200 characters):			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code: <b>NA</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: <b>lb/hour                      tons/year</b>
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**

**Potential Emissions**

1. Pollutant Emitted: <b>VOC</b>		2. Pollutant Regulatory Code: <b>NS</b>	
3. Primary Control Device Code: <b>NA</b>	4. Secondary Control Device Code: <b>NA</b>	5. Total Percent Efficiency of Control:	
6. Potential Emissions: <b>0.286 lb/hour                      1.252 tons/year</b>		7. Synthetically Limited? [ <b>X</b> ]	
8. Emission Factor: <b>0.36 lb/MMBtu</b> Reference: <b>AP-42, Table 3.3-1</b>		9. Emissions Method Code: <b>3</b>	
10. Calculation of Emissions (limit to 600 characters):  <b>Hourly: 0.36 lb/MMBtu x 0.794 MMBtu/hr = 0.286 lb/hr</b> <b>Annual: 0.286 lb/hr x 8760 hr/yr x ton/2000 lb = 1.252 ton/yr</b>			
12. Pollutant Potential Emissions Comment (limit to 200 characters):			

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code: <b>NA</b>	2. Future Effective Date of Allowable Emissions: <b>NA</b>
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: _____ lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**E. VISIBLE EMISSIONS INFORMATION**  
**(Only Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE15 and VE10</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>10 and 15 %</b> Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:    min/hour	
4. Method of Compliance: <b>Method 9</b>	
6. Visible Emissions Comment (limit to 200 characters):  <b>40 CFR 60.672 (c) – crusher subject to 15% opacity limit.</b> <b>40 CFR 60.672 (b) – transfer points on belt conveyors or screening operations are subject to 10% opacity limit.</b>  <b>IT IS REQUESTED THAT REQUIRED VE TESTING FOR COMPLIANCE BE ALLOWED FROM VE TESTING AT ANY OF THE PERMITTED LOCATIONS FOR THE RAP UNIT.</b>	

**F. CONTINUOUS MONITOR INFORMATION**  
**(Only Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

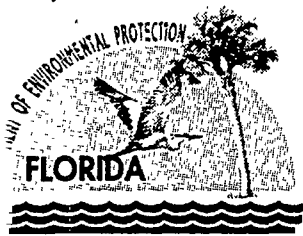
1. Parameter Code: <b>NA</b>	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Manufacturer: _____ Model Number: _____    Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

**G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u> 03 </u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

May 20, 2002

Mr. Charles W. Roberts  
President  
C.W. Roberts Contracting, Inc.  
Hwy 20 East  
Hosford, FL 32334

Dear Mr. Roberts:

Re: Application dated 4/1/2002 (C.W. Roberts Contracting, Inc)  
for construction permit of new Drum Mix Asphalt Plant

On 4/22/2002, the Department received your air pollution construction permit application for the above mentioned facility. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Refer to Page 1, identification of facility, item No. 5 states this asphalt plant is proposed to be relocatable. Please provide a listing of counties it proposes to move to in course of its operation.
2. Refer to Page 5, processing fee for the asphalt plant is noted as \$2,000.00. The Department determines this amount to be \$4,500.00 based on the SO<sub>2</sub> allowable emission of 85 tpy in page 20. Please send the cheque for the balance amount to process the application.
3. Refer to Page 5, processing fee for the RAP Crusher Unit – Portable is noted as \$1, 000.00. However, in page 6 under Portable RAP Crusher, it is mentioned that this unit is already operating in different C.W. Roberts facilities under a general permit No. 7775158-001-AG. It is not clear to the Department what is intended in this permit application as far as the usage of the RAP crusher is concerned. Do you want to continue operating this unit under its current general permit? If so, the fee submitted is not applicable. Please clarify.

*"More Protection, Less Process"*

*Printed on recycled paper.*

NOTE: There are limitations in using the general permit. Refer to DEP Form 62-210.920(10) eligibility determination item No. (h). The routine functions, such as crushing recycled asphalt (rap) at an asphalt plant, and non-routine activities, such as destruction of a building, are mentioned in the form. Please check the group you belong to and adjust the fee submittal accordingly. (A copy of the DEP form 62-210.920 (10) effective 6-21-01, is attached for ready reference).

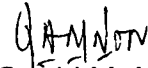
4. Refer to Page 6, insignificant activities – lime silo and GTR tank, please explain the purpose of lime silo at the plant. Also, explain the source of GTR at the facility. Is GTR being manufactured at the facility? If not, where does it come from? Is the GTR transfer/mixing with asphalt cement manually operated or pneumatically operated? Please explain.
5. Refer to Page 6, please list all the diesel engines with their individual capacities that will be used in the facility including the one used in asphalt drum mix plant. Please provide the fuel specification, emission calculations and opacity standard with the following information:
  - a. Type of fuel used;
  - b. Statement of sulfur content not to exceed 0.5% by weight;
  - c. Fuel consumption rate, gallons/hour and maximum yearly consumption rate as gallons/year; and
  - d. Emission calculations for CO, NO<sub>x</sub> and SO<sub>2</sub> if required by the application.
6. Refer to Page 18, please provide reasonable assurance that you will comply with NSPS Subpart I PM limit of 0.04 gr/dscf. Baghouse loading calculations with control efficiency or manufacturer's guarantee for this PM limit will be acceptable. Please provide the methods of compliance with this limit. Mention the range of water column in case the baghouse pressure differential will be indicator for bag replacement.

Please submit the revised site plan and location alongwith the response of this letter or earlier.

NOTE - Rule 62-4:050(3), F.A.C. requires applications of this type must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Therefore, your response to the above requests should be certified by a professional engineer. Please note that per Rule 62-4.055(1), F.A.C.: *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

Your response should be received at SWD by 8/18/2002. If you have any questions, please call me at (813)744-6100 extension 112.

Sincerely,



Quaid M. Noor  
Air Permitting Engineer  
Southwest District, Tampa

QN\  
Enclosure

cc: Mr. Max Lee, Ph. D, P.E., Koogler and Associates  
4014 NW 13<sup>th</sup> Street, Gainesville, FL 32609

Dept. of Environmental  
Protection

FEB 12 2009

Southwest District



**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

KA519-02-01  
June 21, 2002

Quaid M. Noor  
FDEP, Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

Dept. of Environmental  
Protection

FEB 12 2009

**SUBJECT: Response to Request for Additional Information  
C. W. Roberts Contracting, Inc.  
New Asphalt Drum Mix Plant – Sumter county  
Air Construction Permit Application**

Southwest District

Dear Mr. Noor:

On behalf on C.W. Roberts Contracting, Inc. I am submitting the following additional information in response to your letter dated May 20, 2002. I have itemized my response corresponding to the format of your letter. An important change to the permit application should first be noted in that the location of the facility has changed. Attachment A provides four (4) copies of the corresponding revisions to the application information of facility location.

- 1) Refer to Page 1, identification of facility, item No. 5 states this asphalt plant is proposed to be relocatable. Please provide a listing of counties it proposes to move to in course of its operation.

Response:

The relocatable facility will remain at the specified location until such time that C.W. Roberts Contracting, Inc proposes to move elsewhere. At such time, required notifications will be submitted.

- 2) Refer to Page 5, processing fee for the asphalt plant is noted as \$2,000.00. The Department determines this amount to be \$4,500.00 based on SO<sub>2</sub> allowable emission of 85 tpy on page 20. Please send the cheque for the balance amount to process the application.

Response:

A check in the amount of \$2,500.00 payable to "FDEP" is attached. I have reviewed the calculations and discussed them with Mr. Jerry Kissel at your FDEP District office. Based on our

discussion, I am revising the allowable calculation using the EPA factors that correctly account for SO<sub>2</sub> sorption in the asphalt production process. AP-42, Table 11.1-7 states in footnote C:

*Fifty percent of the fuel-bound sulfur, up to a maximum (as SO<sub>2</sub>) of 0.1 lb/ton of product, is expected to be retained in the product, with the remainder emitted as SO<sub>2</sub>.*

Four (4) copies of revised pages 20, 33, and 45 of the application are included in Attachment B. The calculations indicate that the facility-wide allowable SO<sub>2</sub> emissions amount to 59.96 tons SO<sub>2</sub> per year.

- 3) Refer to Page 5, processing fee for the RAP Crusher Unit – Portable is noted as \$1,000.00. However, in page 6 under Portable RAP Crusher, it is mentioned that this unit is already operating in different C.W. Roberts facilities under a general permit No. 7775158-001-AG. It is not clear to the Department what is intended in this permit application as far as the usage of the RAP crusher is concerned. Do you want to continue operating this unit under its current general permit? If so, the fee submitted is not applicable. Please clarify.

Response:

Please note that the application states: **Currently, this Crusher is permitted to operate at C.W. Roberts facilities: 7770100, 7774811, and 7775118, and under a general permit No. 7775158-001-AG.**

In the previous process of permitting the RAP Crusher, FDEP-Northwest District determined that only a minor modification to each facility permit would be required. The minor modification allows flexibility to operate the RAP crusher at any of these asphalt facilities for extended periods of time. As you mention in your letter, the general permit is limited in operation at separately permitted facilities. Therefore, we are requesting this facility permit, similar to other C.W. Roberts Contracting, Inc. facility air permits, include authorization of the portable RAP crusher. I have included a copy of the C.W. Roberts Contracting, Inc. Tallahassee plant permit language in Attachment C.

I indicated to Mr. Kissel that I was not sure how the Southwest District would handle this permitting request. Therefore, I submitted the new emission unit fee (\$1,000) versus a minor modification fee (\$250) as a conservative measure. For details on the previous permitting of the portable RAP crusher, I suggest you contact Bruce Mitchell, FDEP-Tallahassee (850) 488-0114 for his experience with our previous requests.

- 4) Refer to Page 6, insignificant activities – lime silo and GTR tank, please explain the purpose of lime silo at the plant. Also, explain the source of GTR at the facility. Is GTR being manufactured at the facility? If not, where does it come from? Is the GTR transfer/mixing with asphalt cement manually operated or pneumatically operated? Please explain.

Response:

Lime is routinely added to asphalt cement and is a common additive requirement of Florida Department of Transportation specifications. An identical lime silo is in operation at the C.W. Roberts Contracting, Inc. Tallahassee plant. I have included in Attachment D the manufacturer specifications of the silo.

Ground Tire Rubber (GTR) is very similar to asphalt cement and as such is commonly used to meet Florida Department of Transportation mix specifications. GTR and asphalt cement may be stored in similar tanks as both substances have similar properties. The material is transported by truck to the facility by the same suppliers of asphalt cement. GTR is added into the mix by the pneumatic system used for asphalt cement.

I specified the request to have GTR specifically allowed in this permit as other FDEP District permit writers have preferred to specify GTR in addition to asphalt cement to ensure that GTR is authorized for use. Therefore, I mentioned the GTR in the application to request that it will be specifically allowed in the text of the permit.

- 5) Refer to Page 6, please list all the diesel engines with their individual capacities that will be used in the facility including the one used in asphalt drum mix plant....

Response:

The proposed facility will operate almost entirely on electric-grid power. Emissions from the asphalt burner are included in the section 3, Emission unit No. 1. The 120 mmBTU/hr asphalt burner unit is model StarJet 580, manufactured by Hauck. I have attached the manufacturer specifications of this burner (Attachment E).

Only the portable RAP crusher (see item 3) will operate using diesel-engine power. The Emission Unit Section 3, No. 3 indicates that the RAP crusher can use a maximum of 50,770 gallons of diesel fuel annually. The RAP crusher will operate in accordance with F.A.C. 62-210.300(3)(c)1.c. in which sulfur content of fuel will not to exceed 1% by weight and fuel usage will be included in the facility-wide limit of 1.2 million gallons per year. I have attached a copy of the RAP crusher specifications submitted for the general permit (Attachment F).

Mr. Kissel mentioned the concern of NO<sub>x</sub> emissions exceeding SO<sub>2</sub> emissions. Calculations of NO<sub>x</sub> emissions for the facility are 29.72 tpy.

- 6) Refer to Page 18, please provide reasonable assurance that you will comply with NSPS Subpart I PM limit of 0.04 gr/dscf. Baghouse loading calculations with control efficiency or manufacturer's guarantee for this PM limit will be acceptable. Please provide the methods of compliance with this limit. Mention the range of water column in case the baghouse pressure differential will be indicator of bag replacement.

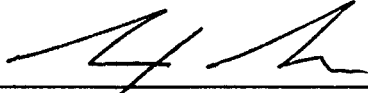
Response:

The applicant will provide reasonable assurance to comply with NSPS limit of 0.04 gr/dscf by annual EPA Method 5 testing (see page 18, Allowable Emissions section). As well, the applicant will ensure compliance with the standard (0.04 gr/dscf) by maintaining the baghouse pressure drop between 2-6 inches of H<sub>2</sub>O. Manufacturer literature is attached (Attachment G). Calculations are included in Attachment G to demonstrate that the baghouse emissions will comply with the standard.

Additional Comments: The insignificant activities of asphalt storage silos were not included in the original application. Please note that three CMI, model 210 asphalt storage silos are requested to be constructed and operated for this facility.

I would appreciate an expedited review of this application. I hope this information provides you all the information requested. Please contact me at your earliest convenience if you have questions or comments (352) 377-5822.

Sincerely,



Max Lee, Ph.D., P.E.-58091

6/21/02

DATE

Dept. of Environmental  
Protection

FEB 12 2009

**Koogler & Associates**

c: : Charles Roberts and Joseph Shuler, C. W. Roberts Contracting Inc.

Southwest District

ATTACHMENT B

SPECIFIC CONDITION NO. 39, OF OPERATION PERMIT 7775175-002-AO

SEPTEMBER, 2008 DATA



C W Roberts Contracting, Inc.  
 Wildwood Asphalt Process Data

date	daily	monthly	12-month	daily	monthly	12-month	daily	incoming	monthly	12-month	daily	monthly	12-month	RAP crush	monthly	12-month	daily	monthly	12-month
	asphalt	asphalt	asphalt	asphalt	asphalt	asphalt	average	fuel loads	asphalt	asphalt	RAP crush	RAP crush	RAP crush	operation	operation	operation	RAP crush	RAP crush	RAP crush
	production	production	production	operation	operation	operation	ton/hr	gallons	fuel usage	fuel usage	production	production	production	hours	hours	hours	fuel usage	fuel usage	fuel usage
	tons	tons	tons	hours	hours	hours			tons	tons	tons	tons	tons	tons	tons	tons	gallons	tons	tons
9/1/2008	0	20874	152252		100 99	718 15			39755	283713	0	0	20185	0	0	175	0	0	1312
9/2/2008	1182			5.25			225	4987			0			0			0		
9/3/2008	1248			5.55			225				0			0			0		
9/4/2008	582			3 64			160				0			0			0		
9/5/2008	135			0 84			161	5971			0			0			0		
9/6/2008	0			0							0			0			0		
9/7/2008	0			0							0			0			0		
9/8/2008	1035			4.6			225				0			0			0		
9/9/2008	1912			8 5			225				0			0			0		
9/10/2008	1773			7 88			225	5982			0			0			0		
9/11/2008	971			4 32			225				0			0			0		
9/12/2008	786			4 91			160				0			0			0		
9/13/2008	0			0							0			0			0		
9/14/2008	0			0							0			0			0		
9/15/2008	505			3 16			160	5995			0			0			0		
9/16/2008	1123			4 99			225				0			0			0		
9/17/2008	696			4 35			160				0			0			0		
9/18/2008	843			3 75			225				0			0			0		
9/19/2008	499			3 12			160	4991			0			0			0		
9/20/2008	0			0							0			0			0		
9/21/2008	0			0							0			0			0		
9/22/2008	722			4.51			160				0			0			0		
9/23/2008	1497			6.65			225				0			0			0		
9/24/2008	1283			5 7			225	5931			0			0			0		
9/25/2008	1718			7.64			225				0			0			0		
9/26/2008	84			0 53			158				0			0			0		
9/27/2008	0			0							0			0			0		
9/28/2008	0			0							0			0			0		
9/29/2008	538			3 36			160	5898			0			0			0		
9/30/2008	1742			7 74			225				0			0			0		